

To: Robin, George[Robin.George@epa.gov]
From: George Robin
Sent: Thur 4/18/2013 9:21:54 PM
Subject: (Katherine Moore) Fw: Class VI wells in California

----- Forwarded by George Robin/R9/USEPA/US on 04/18/2013 02:21 PM -----

From: "Moore, Katharine" <Katharine.Moore@sen.ca.gov>
To: George Robin/R9/USEPA/US@EPA, David Albright/R9/USEPA/US@EPA,
Date: 01/14/2013 06:11 PM
Subject: RE: Class VI wells in California

Thank you both very much for your help today. I very much appreciate it.
You've given me a number of aspects I need to follow-up with some others on. I will be in touch.
Again, thank you for your help.

Warm regards,
Katharine

From: Robin.George@epamail.epa.gov [<mailto:Robin.George@epamail.epa.gov>]
Sent: Monday, January 14, 2013 3:37 PM
To: Albright.David@epamail.epa.gov
Cc: Moore, Katharine
Subject: Re: Class VI wells in California

David,

Yes, I just had a discussion with Katherine. There was only enough time to cover the outlined scope of her concerns, however she understands that we are certainly open to discussing these issues further.

I told her I will close this reply with my contact information so that she can have both of ours in one email.

George Robin
Engineer
Ground Water Office, WTR-9
Underground Injection Control program
415-972-3532 ofc

From: David Albright/R9/USEPA/US
To: George Robin/R9/USEPA/US@EPA,
Date: 01/14/2013 01:52 PM
Subject: Fw: Class VI wells in California

Hi George,

I think you would be a good person for Katharine to speak to about the issues she identified. Would you mind giving her a call?

Let me know. Thanks,
David

David Albright
Manager, Ground Water Office

USEPA, Region IX Phone: 415.972.3971
75 Hawthorne Street Fax: 415.947.3549
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San Francisco, CA 94105

----- Forwarded by David Albright/R9/USEPA/US on 01/14/2013 01:49 PM -----

From: "Moore, Katharine" <Katharine.Moore@sen.ca.gov>
To: David Albright/R9/USEPA/US@EPA,
Date: 01/14/2013 01:42 PM
Subject: RE: Class VI wells in California

Hi David,

Thank you for responding so promptly.

I think my answer is both.

From a regulatory perspective –

- ☐ ☐ ☐ ☐ I am aware that DOGGR has UIC primacy under section 1425 and has recently committed to a series of actions in response to the EPA's audit.
- ☐ ☐ ☐ ☐ I don't know how a potential application to the EPA for a Class VI well or EPA direct regulation of a Class VI well would overlay/depend upon/interact with DOGGR's existing authority for Class II wells in the same field. I am particularly curious with respect to air monitoring (which generally is outside DOGGR's authority).
- ☐ ☐ ☐ ☐ I am curious how a potential primacy application for Class VI wells under section 1422 would or would not impact the existing Class II program moving forward. (I gather there is a provision for an application to the EPA for a Class VI permit that is in process could be transferred if primacy is granted.)
- ☐ ☐ ☐ ☐ I am trying to understand what statutory or regulatory changes would be necessary in either California law or regulation to permit the state to seek primacy for Class VI – particularly given that current primacy is to the section 1425 standard.
- ☐ ☐ ☐ ☐ I am also trying to understand from a practical perspective what likely timelines would be.

From a technical perspective –

- ☐ ☐ ☐ ☐ I would like to speak w/someone familiar with CO2 EOR. I understand there has been a study or two investigating permanent sequestration of CO2 associated with EOR but would like more information. My

experience w/EOR (many years ago I helped to design and monitor the construction of an upstream secondary production platform) led me to believe that at least some of the injected species were recovered with the produced hydrocarbons.

Does this help?

Thanks.

Katharine

From: Albright.David@epamail.epa.gov [<mailto:Albright.David@epamail.epa.gov>]
Sent: Monday, January 14, 2013 12:22 PM
To: Moore, Katharine
Subject: Re: Class VI wells in California

Hi Katharine,

I suppose it depends whether you want to speak to someone at EPA from a California perspective on the Class VI wells, or not. There are probably many more folks in HQs with better knowledge about the intricacies of Class VI wells who could speak as national experts, but they would not know anything about the existing regulatory program in CA.

Let me know your thoughts.

Thanks,

David

David Albright
Manager, Ground Water Office

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From: "Moore, Katharine" <Katharine.Moore@sen.ca.gov>
To: David Albright/R9/USEPA/US@EPA,
Date: 01/14/2013 12:12 PM
Subject: Class VI wells in California

Good afternoon,

The issue of Carbon Capture and Sequestration has come before the California Legislature again. I am very interested in speaking with a Class VI well expert at the EPA in order to obtain a program update. As you are the Region IX UIC manager, I thought I would ask you who you would recommend (if not you, yourself). I have been looking through some of the material on the EPA's web-site.

Thank you for your time.

Warm regards,
Katharine

Katharine Moore, Ph.D.
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